

**CALFED BAY-DELTA PROGRAM
COMMENTS: DRAFT EIS/EIR
JUNE 30, 1998**

SOLUTION PRINCIPLES

The CALFED BAY-DELTA PROGRAM as set forth in the EIR/EIS violates its own "Solution Principles" in many areas. The most significant are:

I. The "ISOLATED FACILITY"

- 1. FURTHERS (instead of reducing) CONFLICTS in the system. It does not generate enough NEW water to provide for California's long term needs. It does not regenerate the spoiled flows of the San Joaquin River.**
- 2. Is NOT EQUITABLE. It separates the Delta from its own fresh water flows. It absolutely harms South Delta water quality.**
- 4. It is NOT a DURABLE solution for the Delta water problems, as it will severely limit fresh water flows through the Delta in drought years.**
- 5. It is NOT IMPLEMENTABLE because it does NOT have broad public acceptance legal feasibility. It will absolutely be the most difficult component of any alternative to implement.**
- 6. It HAS SIGNIFICANT REDIRECTED IMPACTS. The Delta as a farming economy will be destroyed so that other water users can benefit.**
- 7. FOR ALL OF THE ABOVE REASONS, THE ISOLATED FACILITY IS NOT AFFORDABLE. (solution principle #3)**

The only way for the CALFED BAY-DELTA PLAN follow its own Solution Principles is to find a method to achieve its goals while maintaining a "COMMON POOL" of water on which ALL project users depend. This is the only "assurance" that Delta users can accept. The "Isolated Facility" must be deleted from the Plan as a component of any Alternative.

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II. "Land Retirement"

This component of the Ecosystem Restoration Program, as it relates to the Delta, **MUST** be deleted from this Plan. It is absolutely **NOT** Equitable, **NOT** affordable, **NOT** implementable and would have Unacceptable Significant Redirected Impacts. (see further comments-"Economic Impacts") Any "restoration" should be done on lands currently owned by the government. This Plan should have more thoroughly identified those lands. San Joaquin County already has a County-Wide Multi-Species Habitat Protection and Open Space Plan.

III. Missing Components

The CALFED BAY-DELTA PLAN as proposed is missing some components which are Integral to meeting the Solution Principles.

1. Increased releases from Friant Dam into the San Joaquin River **MUST** be a part of the Plan. There is no solution which will "fix" the Delta until these flows are restored. Any Plan which does not include these releases is subject to challenge.
2. Increased planning and funding of municipal water treatment facilities **MUST** be a part of the Plan. Urban areas must become more self-sufficient vis a vis recycling and re-use of water, de-salting water, and must do it within their own spheres. The Plan must develop this component further.
3. The Plan **MUST** include more development of off stream water storage, including more reservoirs of the scope and size of San Luis Reservoir. Not to do so will insure that the Plan will not be durable. CALFED must plan for the extended needs of California water users.

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"ADAPTIVE MANAGEMENT" AND "SCIENTIFIC UNCERTAINTY"

The CALFED BAY-DELTA PLAN Draft EIS/EIR contains very basic and serious conflicting policy statements:

Section 2.3.3.5 "Adaptive Management" (page 2-33 of Programmatic EIS/EIS) states "In its practical application, adaptive management must be strongly based on the scientific method and its ultimate success lies in the integration of scientific information and technical evaluations."

Then:

"Issues to be Resolved" in the Phase II Interim Report (page 137) states "...within the 1998 time frame for the CALFED EIR/EIS, policy judgements must be made within the constraints of continuing scientific uncertainty."

This EIR/EIS must be challenged on this conflict. POLICY JUDGEMENTS MADE WITHOUT SOUND BASIS IN SCIENCE ARE POTENTIALLY FLAWED JUDGEMENTS.

Given the huge scope of this Plan, and its enormous economic impacts, especially to the Delta area, this conflict must be resolved on the side of sound science.

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WATER USE EFFICIENCY

There are some assumptions in the Plan's Water use Efficiency Component which are INCOMPLETE or absolutely INCORRECT.

Take for example, the first assumption on page 4-5 of the Technical Appendix: "State-wide, agricultural acreage is expected to decline as a result of ... ecosystem restoration activities, land retirement, water transfers." If acreage in a particular area declines, (for example, in the Delta, due to "retirement") the market for food and fiber will dictate that Delta crops be grown elsewhere in California, and there will be a response to that demand. Lack of water is not the only criteria which determines where crops are grown. Quality of soil and proximity to markets, are important factors. But if demand creates a high enough price, then those crops will move and THE WATER NEEDED TO GROW THEM WILL BE FOUND. THIS PLAN "ASSUMPTION" IS FLAWED.

Another example of a totally INCORRECT ASSUMPTION is the last paragraph on page 4-6 of this same Technical appendix, which discusses cost efficiency and the "Social" issues involved in the decision to increase efficiency. THIS PARAGRAPH HAS NO BASIS IN FACT AND SHOULD BE DELETED FROM THIS EIR.

1. GROWERS ABSOLUTELY LOOK AT LONG TERM RETURN ON INVESTMENT when making decisions to improve efficiency of systems. Cropping plans typically go out five, seven or ten years or longer. How else can you plan for your return on a permanent crop, such as asparagus, orchards or even alfalfa, which is in the ground for four or five years? How else can you finance the cost of expensive farm equipment? Extended business plans are absolutely REQUIRED by the finance industry before growers can obtain crop or land loans. THE ASSUMPTION THAT GROWERS ARE NOT WILLING TO MAKE LONG TERM CAPITAL INVESTMENTS IS A FALSE ASSUMPTION.

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**WHOEVER WROTE THIS PARAGRAPH DOES NOT HAVE A CORRECT
KNOWLEDGE OF AG/BUSINESS FINANCE AND PLANNING.**

- 2. GROWERS DO NOT TYPICALLY ENTRUST THE IRRIGATION OF A
VALUABLE CROP TO AN 'UNTRAINED FIELD WORKER'.**

**Growers are professional businessmen, with huge crop and land loans to pay. IT IS
A FALSE ASSUMPTION that they are careless with their management of irrigation
practices, and this FALSE ASSUMPTION and should be deleted from this EIR/EIS.**

- 3. "...THE GENERATIONAL PASSING OF KNOWLEDGE ... CAN SLOW THE
ACCEPTANCE OF NEW TECHNOLOGIES..." IS A FALSE ASSUMPTION.**

**California farms, first of all, are not all family farms. But most importantly, on
SUCCESSFUL family farm operations, new technology is EMBRACED, as long as
it is cost effective! (See #1 above). This FALSE ASSUMPTION should be deleted
from this EIR/EIS.**

**The ADDITIONAL ASSURANCES discussion (page 2-R) in the Technical Appendix of
this component of the Plan is absolutely deficient. This Plan cannot be properly
evaluated, nor its impacts understood, until the Plan provides specific assurances. The
"COMPREHENSIVE PACKAGE OF ASSURANCES" must be available for review
and comment BEFORE any Plan is adopted. NOT TO PROVIDE such documentation of
the Plan's true impact violates the letter and intent of the NEPA/CEQA process and will
make the Plan subject to legal challenges.**

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ECONOMIC IMPACTS

The figures used to evaluate the economic impacts to various regions are wrong. And they are wrong in a way that underestimates the true impact of these Alternatives on the Delta and San Joaquin County, in particular. For the record, the value of San Joaquin County crops exceeded ONE POINT FOUR BILLION DOLLARS IN 1997! (\$1,400,000,000)

1. The "Economic Multiplier" (page 8.1-14 of the Draft) which was used to determine the value of agricultural income is wrong. The study uses a figure of 3.2. (In other words, for every dollar of Ag income, 3.2 dollars is the value of that dollar as it ripples out through the local economy.)

EXPERTS WILL TELL YOU THAT IN THIS COUNTY, THE ECONOMIC MULTIPLIER IS BETWEEN 5 and 7.

Therefore, this study has severely underestimated the value of our Agricultural production dollar to the County as a whole.

2. For some reason, in this economic analysis, STOCKTON was divided between two zones: 46% Delta and 54% Central Valley. By doing this, the true costs to Stockton and the Delta region are distorted. Impacts on San Joaquin County AS A WHOLE would be a better way to obtain a true understanding.

3. Impacts on jobs seem to be limited to "reduction in farm labor". A better analysis of this impact would be to acknowledge the many highly skilled jobs that are affected by any plan to "retire" land from production: airplane and helicopter pilots, heavy equipment operators, laboratory technicians, engineers, soil scientists, insurance carriers, finance experts, biologists, entomologists, computer technical support, etc. Farming has become a highly technical business, but this report does not acknowledge either the true value of the crops nor the people that make this industry such a huge success in this County! ONE BILLION FOUR HUNDRED MILLION DOLLARS x \$5/\$7 (MULTIPLIER) IS NOT PEANUTS!

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4. Finding number 8.6.2.7 (page 8.6-16) regarding "Potentially Significant Unavoidable Impacts" reads as follows:

'NO SIGNIFICANT ECONOMIC IMPACTS ARE EXPECTED'

This EIR/EIS should be challenged on the very fact that this economic analysis is completely unreliable, AND UNTIL IT HAS BEEN SATISFACTORILY REVISED, it cannot be used on which to base any further decision making.

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INEQUITY

Over and over throughout the Draft EIR/EIS, data tables show overwhelmingly that most **NEGATIVE IMPACTS** of the Plan Alternatives (especially the **ISOLATED TRANSFER FACILITY** and the **ECOSYSTEM RESTORATION PROGRAM**) impact the Delta and **ALL** other zones **EXCEPT** the Central Valley Project and the State Water Project providers **SOUTH OF KERN COUNTY**.

In other words, the South benefits- the North is harmed!

This is a list of those "Summaries of Environmental Impacts":

- Table 5-2 (p5-6) Estimated Acreages of Important Farmland Impacted
- Table 5-3 (p5-8) Possible Land Area affected by Ecosystem Restoration
- Table 6.3-1 (p6.3-2) Impacts Related to Geology and Soils
- Table 6.5-1 (p6.5-2) Impacts Related to Transportation
- Table 8.1-1 (p8.1-2) Impacts Related to Agricultural Land and Water Use
- Table 8.1-3 (p8.1-4) Impacts Related to Agricultural Resources - Social Issues
- Table 8.2-1 (p8.2-2) Impacts Related to Urban Land Use
- Table 8.3-1 (p8.3-2) Impacts Related to Recreational Resources
- Table 8.6-1 (p8.6-2) Impacts Related to Regional Economics
- Table 8.7-1 (p8.7-2) Impacts Related to Cultural Resources
- Table 8.9-1 (p8.9-2) Impacts Related to Visual Resources

EVERY ONE OF THESE TABLES SUMMARIZES ENVIRONMENTAL IMPACTS OF PROGRAM COMPONENTS, AND SHOWS THE DELTA ZONE AS BEING THE MOST NEGATIVELY IMPACTED!

This said, we should refer to Table 8.2.3-3 (page 8.2-35) labeled:

**SHARES OF INCREASE CALFED WATER SUPPLY FOR SWP AND CVP
MUNICIPAL AND INDUSTRIAL USERS.**

27% of CALFED water goes to the providers NORTH of Kern County.

73% goes to Users South of Kern County.

EQUITABLE??? Hardly!! Over and over again, the Delta and other Zones in the North take the brunt of the negative impacts, while the Southern users get the bulk of the water produced in the Plan.

I am OPPOSED to a BAY-DELTA PLAN which harms one area while enriching another. The components, especially the Isolated facility and the Ecosystem Restoration

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Program, violate two of your own "SOLUTION PRINCIPLES" - That the Plan will be
EQUITABLE and that it will HAVE NO SIGNIFICANT REDIRECTED IMPACTS.

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